

The Honorable Marsha J. Pechman

08-CV-00510-PRO

FILED ENTERED
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AT SEATTLE
CLERK U.S. DISTRICT COURT
BY WESTERN DISTRICT OF WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Richard O. Buse,

Plaintiff,

v.

First American Title Insurance Company,
Foreclosurelink, Inc., Greenpoint Mortgage
Funding, Inc., Mortgage Electronic
Registration Systems, Inc., Rescomm
Holdings No. 2, LLC, UM Acquisitions,
LLC, Tom Block, and Doe Defendants 1
through 20,

Defendants.

Case No. C-08-0510-MJP

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC. TO
RESPOND TO AMENDED COMPLAINT**

NOTE ON MOTION CALENDAR:
April 8, 2008

WHEREAS Defendant Mortgage Electronic Registration Systems, Inc.'s ("Mortgage Electronic") response to Plaintiff's Amended Complaint is currently due on April 8, 2008;

WHEREAS this case involves numerous parties, causes of action and complicated allegations;

WHEREAS Mortgage Electronic has just recently retained DLA Piper US LLP to represent it in this matter;

WHEREAS DLA Piper US LLP is now working as quickly as it can to educate itself about this matter in order to adequately represent Mortgage Electronic;

STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO
AMENDED COMPLAINT
C-06-1002 RSL - 1

DLA Piper US LLP
701 Fifth Avenue, Suite 7000
Seattle, WA 98104-7044 | Tel: 206.839.4800

ORIGINAL

1 WHEREAS no other parties have answered the Amended Complaint;

2 WHEREAS it would be in the parties' best interests and in the interests of judicial
3 economy to allow the parties a short period of time to explore the possibility of resolving this
4 dispute before undergoing the expense and burden of moving forward with this litigation;

5 THEREFORE, Mortgage Electronic and Plaintiff have stipulated and agreed that
6 Mortgage Electronic shall have until April 18, 2008 to respond to the Amended Complaint.

7 ORDER

8 It is so ordered.

9
10 Dated this 8th day of April, 2008.

11
12 UNITED STATES DISTRICT JUDGE

13
14 SO STIPULATED AND AGREED:

15
16 DLA PIPER US LLP

17 

18 /s/ Russell B. Wuchler
19 Stellman Keehnell, WSBA No. 9309
20 Russell B. Wuchler, WSBA No. 37941
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Attorneys for Defendant Mortgage
Electronic Registration Systems, Inc.

SE9109307.1

STIPULATION AND (PROPOSED) ORDER
EXTENDING TIME FOR MORTGAGE
ELECTRONIC TO RESPOND TO AMENDED
COMPLAINT - 2

LAW OFFICES OF MELISSA A.
HUELSMAN, P.S.

17 

18 /s/ Melissa A. Huelsman (with permission)
19 Melissa A. Huelsman, WSBA No. 30935
20 LAW OFFICES OF MELISSA A.
21 HUELSMAN, P.S.
22 705 Second Avenue, Suite 501
23 Seattle, WA 98104
24 Telephone: 206.447.0103
25 Mhuelsman@predatorylendinglaw.com

Attorney for Plaintiff Richard O. Buse

DLA Piper US LLP
701 Fifth Avenue, Suite 7000
Seattle, WA 98104-7044 | Tel: 206.839.4800

CERTIFICATE OF SERVICE

I, Shelley G. Barolet, hereby certify that I caused to be served the *Stipulation and [Proposed] Order Extending Time for Defendant Mortgage Electronic Registration Systems, Inc. to Respond to Amended Complaint*, via U.S. Mail, to the following:

Melissa A. Huelsman
LAW OFFICES OF MELISSA A.
HUELSMAN, P.S.
705 Second Avenue, Suite 501
Seattle, WA 98104
*Attorney for Plaintiff Richard O.
Buse*

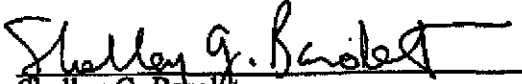
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*Attorney for Defendants Greenpoint
Mortgage Funding, Inc. and Tom
Block*

Peter Salmon
PITE DUNCAN, LLP
525 East Main Street
El Cajon, CA 92022
*Attorney for Defendants First
American Title Insurance Company
and Foreclosurelink, Inc.*

Dated this 8th day of April, 2008, at Seattle, Washington.


Shelley G. Barolet

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

329109507.1

STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO
AMENDED COMPLAINT - 1

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